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**From:** Kavvadias, Eleni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6FC8EF800C2A4A8D8FF66F2FD465A9C7-KAVVADIAS,]  
**Sent:** 11/16/2021 2:58:41 PM  
**To:** Nolan, Katherine [DEP] [Katherine.Nolan@dep.nj.gov]  
**CC:** Dudar, Helen [helen.dudar@dep.nj.gov]  
**Subject:** RE: Chemours Chamber Works Solar - Landfill A

Hi Katie,

I realized, a little too late, that I am OOO Thursday (how does one forget their own vacation!) and Andy and Adolph unfortunately have a conflict. But I have relayed EPA's concerns to Helen which I saw she already shared with the group. If it is possible to get meeting minutes from Chemours or DEP that would be great. If not I'll circle back with Helen when I return.

Thanks,  
Eleni

Eleni Kavvadias  
Life Scientist  
U.S. EPA Region 2  
LCRD, LRPB, CAS  
(212) 637-4138



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**From:** Nolan, Katherine [DEP] <Katherine.Nolan@dep.nj.gov>  
**Sent:** Tuesday, November 16, 2021 9:18 AM  
**To:** Dudar, Helen <helen.dudar@dep.nj.gov>; Shah, Ram [DEP] <Ram.Shah@dep.nj.gov>; Gerchman, Michael [DEP] <Michael.Gerchman@dep.nj.gov>; Hull, Ross [DEP] <Ross.Hull@dep.nj.gov>  
**Cc:** Fontana, Anthony [DEP] <Anthony.Fontana@dep.nj.gov>; Steve.Maybury@dep.nj.gov; Kavvadias, Eleni <kavvadias.eleni@epa.gov>  
**Subject:** RE: Chemours Chamber Works Solar - Landfill A

Sounds good to me, thanks Helen!

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**From:** Dudar, Helen [DEP] <Helen.Dudar@dep.nj.gov>  
**Sent:** Tuesday, November 16, 2021 8:55 AM  
**To:** Nolan, Katherine [DEP] <Katherine.Nolan@dep.nj.gov>; Shah, Ram [DEP] <Ram.Shah@dep.nj.gov>; Gerchman, Michael [DEP] <Michael.Gerchman@dep.nj.gov>; Hull, Ross [DEP] <Ross.Hull@dep.nj.gov>  
**Cc:** Fontana, Anthony [DEP] <Anthony.Fontana@dep.nj.gov>; Maybury, Steve [DEP] <Steve.Maybury@dep.nj.gov>; Kavvadias, Eleni <kavvadias.eleni@epa.gov>  
**Subject:** RE: Chemours Chamber Works Solar - Landfill A

I recommend that the comments stay internal (for now).

The purpose of my comments is to inform the DEP and USEPA staff of the conditions at the location of the Landfill A. The staff can keep the facts in mind as Chemours presents their tentative plans.

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**From:** Nolan, Katherine [DEP] <[Katherine.Nolan@dep.nj.gov](mailto:Katherine.Nolan@dep.nj.gov)>

**Sent:** Tuesday, November 16, 2021 8:35 AM

**To:** Dudar, Helen [DEP] <[Helen.Dudar@dep.nj.gov](mailto:Helen.Dudar@dep.nj.gov)>; Shah, Ram [DEP] <[Ram.Shah@dep.nj.gov](mailto:Ram.Shah@dep.nj.gov)>; Gerchman, Michael [DEP] <[Michael.Gerchman@dep.nj.gov](mailto:Michael.Gerchman@dep.nj.gov)>; Hull, Ross [DEP] <[Ross.Hull@dep.nj.gov](mailto:Ross.Hull@dep.nj.gov)>

**Cc:** Fontana, Anthony [DEP] <[Anthony.Fontana@dep.nj.gov](mailto:Anthony.Fontana@dep.nj.gov)>; Maybury, Steve [DEP] <[Steve.Maybury@dep.nj.gov](mailto:Steve.Maybury@dep.nj.gov)>; Kavvadias, Eleni <[kavvadias.eleni@epa.gov](mailto:kavvadias.eleni@epa.gov)>

**Subject:** RE: Chemours Chamber Works Solar - Landfill A

Thank you Helen for your additional comments.

Question for the group: Would you like me to share the comments from Helen and Ram with the Chemours representatives ahead of the meeting? Or are these comments meant to be for internal use only?

I am happy to pass them along, or if it's something you'd rather bring up during the meeting, that is fine too. Just want to clarify.

Thanks,

**Katie Nolan**

*Team Leader for Renewable Energy & Offshore Wind*

*Team Leader of Redevelopment & Restoration*

New Jersey Department of Environmental Protection

Office of Permitting & Project Navigation

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Office #: (609) 292-3600

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Email: [Katherine.Nolan@dep.nj.gov](mailto:Katherine.Nolan@dep.nj.gov)

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**From:** Dudar, Helen [DEP] <[Helen.Dudar@dep.nj.gov](mailto:Helen.Dudar@dep.nj.gov)>

**Sent:** Tuesday, November 16, 2021 7:32 AM

**To:** Shah, Ram [DEP] <[Ram.Shah@dep.nj.gov](mailto:Ram.Shah@dep.nj.gov)>; Gerchman, Michael [DEP] <[Michael.Gerchman@dep.nj.gov](mailto:Michael.Gerchman@dep.nj.gov)>; Hull, Ross [DEP] <[Ross.Hull@dep.nj.gov](mailto:Ross.Hull@dep.nj.gov)>

**Cc:** Fontana, Anthony [DEP] <[Anthony.Fontana@dep.nj.gov](mailto:Anthony.Fontana@dep.nj.gov)>; Nolan, Katherine [DEP] <[Katherine.Nolan@dep.nj.gov](mailto:Katherine.Nolan@dep.nj.gov)>; Maybury, Steve [DEP] <[Steve.Maybury@dep.nj.gov](mailto:Steve.Maybury@dep.nj.gov)>; Kavvadias, Eleni <[kavvadias.eleni@epa.gov](mailto:kavvadias.eleni@epa.gov)>

**Subject:** Chemours Chamber Works Solar - Landfill A

Good morning,

To add to Ram's e-mail, attached please find a memo that contains details for Landfill A. As the information within the memo indicates, this is not your ordinary landfill. There is copious amounts of contamination present related to both landfills.

BCM and the USEPA are primarily concerned with how the proposed project may impact the ability to continue investigating the soil and groundwater contamination attributed to Landfill A and to the underlying

portion of SWMU 8. This concern includes the PFAS contamination attributed to the site. With the exception of groundwater sampling, these areas have not been investigated for PFAS. Both likely received PFAS waste.

This is all for now.

Helen

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**From:** Shah, Ram [DEP] <[Ram.Shah@dep.nj.gov](mailto:Ram.Shah@dep.nj.gov)>

**Sent:** Friday, November 5, 2021 11:19 AM

**To:** Gerchman, Michael [DEP] <[Michael.Gerchman@dep.nj.gov](mailto:Michael.Gerchman@dep.nj.gov)>; Hull, Ross [DEP] <[Ross.Hull@dep.nj.gov](mailto:Ross.Hull@dep.nj.gov)>

**Cc:** Fontana, Anthony [DEP] <[Anthony.Fontana@dep.nj.gov](mailto:Anthony.Fontana@dep.nj.gov)>; Nolan, Katherine [DEP] <[Katherine.Nolan@dep.nj.gov](mailto:Katherine.Nolan@dep.nj.gov)>;

Maybury, Steve [DEP] <[Steve.Maybury@dep.nj.gov](mailto:Steve.Maybury@dep.nj.gov)>; Dudar, Helen [DEP] <[Helen.Dudar@dep.nj.gov](mailto:Helen.Dudar@dep.nj.gov)>

**Subject:** RE: Chemours Chamber Works Solar

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Katie:

I have reviewed the Permit Readiness Check List for the Chemours Chamber Works Solar project located in Carney's Point Township, Salem County, NJ Solar Project. Based on my review, I offer the following:

#### **Status of the Chemours A&B Landfill**

The Chemours Landfill is a Class III Landfill which is limited to accepting only Waste Type 13C, construction and demolition waste, generated exclusively at the Chambers Works site. The Landfill is comprised of two areas; Landfill A and Landfill B. They are adjacent to each other separated by Patrol Road. Landfill A, 27 acres in size, ceased operations in 1994 and Landfill B which is about 19 acres continues to operate.

The Chemours A&B Landfill is part of the 140-acre tract of land known as Solid Waste Management Unit # 8 (SWMU 8). SWMU 8 is currently being investigated by the USEPA (RCRA Programs Branch) Region II and by the Department's Site Remediation Program (SRP). Landfill A has been filled to the permitted capacity (approximately 890,000 cubic yards); however, due to the ongoing investigation, Chemours has not yet capped the Landfill A. The final cover requirements for the Landfill A consist of the following in descending order:

- a) a 6-inch topsoil layer;
- b) a 12-inch layer of clean cover soil;
- c) a geosynthetic drainage composite;
- d) a 40-mil low density polyethylene geomembrane; and
- e) a 1-foot intermediate cover material layer.

Chemours Landfill has no leachate collection system. The ground water at this site is pumped and treated at the Chambers Works Wastewater Treatment Plant.

#### **Proposal**

Chemours has proposed installation of solar panels on top of the Landfill A. The Permit Readiness Check List indicated that there was a potential to request alternate closure/cover plan based on project details. This proposal lacks details and requires further clarification from the applicant.

Thanks,

Ram

Ram Shah, Environmental Engineer 3  
Division of Solid & Hazardous Waste  
Bureau of Solid Waste Permitting

401 E. State Street  
Mail Code 401-02C  
P.O. Box 420  
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P: (609) 984-4610  
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[Ram.shah@dep.nj.gov](mailto:Ram.shah@dep.nj.gov)

**From:** Nolan, Katherine [DEP] <[Katherine.Nolan@dep.nj.gov](mailto:Katherine.Nolan@dep.nj.gov)>

**Sent:** Thursday, November 4, 2021 10:20 AM

**To:** Dudar, Helen [DEP] <[Helen.Dudar@dep.nj.gov](mailto:Helen.Dudar@dep.nj.gov)>; Maybury, Steve [DEP] <[Steve.Maybury@dep.nj.gov](mailto:Steve.Maybury@dep.nj.gov)>; Gerchman, Michael [DEP] <[Michael.Gerchman@dep.nj.gov](mailto:Michael.Gerchman@dep.nj.gov)>; Motter, Allan [DEP] <[Allan.Motter@dep.nj.gov](mailto:Allan.Motter@dep.nj.gov)>; Young, Natalie [DEP] <[Natalie.Young@dep.nj.gov](mailto:Natalie.Young@dep.nj.gov)>; Breder, Eric [DEP] <[Eric.Breder@dep.nj.gov](mailto:Eric.Breder@dep.nj.gov)>; Biggins, Suzanne [DEP] <[Suzanne.Biggins@dep.nj.gov](mailto:Suzanne.Biggins@dep.nj.gov)>; Springer, Kim [DEP] <[Kim.Springer@dep.nj.gov](mailto:Kim.Springer@dep.nj.gov)>; Krukowski, Eleanor [DEP] <[Eleanor.Krukowski@dep.nj.gov](mailto:Eleanor.Krukowski@dep.nj.gov)>; Wong, Danny [DEP] <[Danny.Wong@dep.nj.gov](mailto:Danny.Wong@dep.nj.gov)>; Eichman, Kevin [DEP] <[Kevin.Eichman@dep.nj.gov](mailto:Kevin.Eichman@dep.nj.gov)>; August, Jessica [DEP] <[Jessica.August@dep.nj.gov](mailto:Jessica.August@dep.nj.gov)>; Kavvadias, Eleni <[kavvadias.eleni@epa.gov](mailto:kavvadias.eleni@epa.gov)>

**Cc:** Schick, Kevin [DEP] <[Kevin.Schick@dep.nj.gov](mailto:Kevin.Schick@dep.nj.gov)>; Davis, Mark [DEP] <[Mark.Davis@dep.nj.gov](mailto:Mark.Davis@dep.nj.gov)>; Olivera, Stephen [DEP] <[Stephen.Olivera@dep.nj.gov](mailto:Stephen.Olivera@dep.nj.gov)>; Myers, Stephen [DEP] <[Stephen.Myers@dep.nj.gov](mailto:Stephen.Myers@dep.nj.gov)>; Pepe, David [DEP] <[David.Pepe@dep.nj.gov](mailto:David.Pepe@dep.nj.gov)>; Brunatti, Megan [DEP] <[Megan.Brunatti@dep.nj.gov](mailto:Megan.Brunatti@dep.nj.gov)>

**Subject:** Chemours Chamber Works Solar

To All;

**SRP Case Management:** Helen Dudar, Steve Maybury

**Solid Waste:** Mike Gerchman

**SRP-BEERA:** Allan Motter (cc: Kevin Schick)

**LRP:** Natalie Young, Eric Breder (cc: Mark Davis, Steve Olivera)

**ODST:** Suzanne Biggins

**F&W:** Kim Springer

**Stormwater:** Eleanor Krukowski

**Air Permitting:** Danny Wong

**Air C&E:** Kevin Eichman

**Climate Change and Clean Energy:** Jessica August (cc: Steve Myers)

**EPA:** Eleni Kavvadias

**Site Location**

67 Canal Road, Deepwater (Carney's Point Township)  
Salem County, New Jersey  
Block 185, Lot 1

Good Morning.

The Office of Permitting and Project Navigation has received a permit readiness checklist for the Chemours Chamber Works Solar project located in Carney's Point Township, Salem County, NJ.

The applicant has requested a meeting to discuss a potential solar project on the "A" Landfill. This project is still early in the design phase of the project so not all details are available at this time. The applicant wishes to engage with the Department on the regulatory requirements needed to construct a solar array at the site. See attached for the project information.

Please review the project information and provide your program comments to me via email ([Katherine.Nolan@dep.nj.gov](mailto:Katherine.Nolan@dep.nj.gov)) by **Thursday November 18th**.

OPPN will be scheduling a meeting with all applicable parties pending a busy search starting after **November 18th**.

Thank you for your time and participation.

**Katie Nolan**

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